

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
AT LAW AND IN ADMIRALTY

---

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$18,700.04 IN UNITED  
STATES CURRENCY FROM INCOMM, and

APPROXIMATELY \$2,776.72 IN UNITED  
STATES CURRENCY,

Defendants.

---

**VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM**

---

The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for this district, alleges the following in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**Nature of the Action**

1. This is a civil action to forfeit properties to the United States of America, under 18 U.S.C. §§ 981(a)(1)(A) and (C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), for violations of 18 U.S.C. §§ 1029, 1343, and 1956(h).

**The Defendants In Rem**

**Approximately \$18,700.04 in United States currency from InComm**

2. On or about November 15, 2019, officers with the Greenfield, Wisconsin Police Department seized as evidence a total of approximately 4,310 prepaid access devices, or gift cards, during the search of the BMW, used by an individual having the initials N.P., at or near

5085 S. Greenbrook Terrace, Greenfield, Wisconsin. A total of 208 of those access device cards had been activated and loaded with funds. Those 208 prepaid access devices were placed into evidence at the Greenfield Police Department.

3. On or about November 15, 2019, officers with the Elm Grove, Wisconsin Police Department seized four prepaid access devices, or gift cards, from Gevorg Poghosyan at or near the Elm Grove Police Department, 13600 Juneau Blvd., Elm Grove, Wisconsin. All four of those access device cards had been activated and loaded with funds. Those four prepaid access devices were placed into evidence at the Elm Grove Police Department.

4. The total of 212 prepaid access devices seized as evidence by the Greenfield and Elm Grove Police Departments are more fully identified in Exhibit A.

5. On or about December 23, 2019, pursuant to seizure warrant #19-988M issued by United States Magistrate Judge Nancy Joseph in the Eastern District of Wisconsin, the United States Secret Service seized the 212 prepaid access devices, including all funds available on those cards, from the Greenfield and Elm Grove Police Departments.

6. Also on or about December 23, 2019, the United States Secret Service served seizure warrant #19-988M on InComm.

7. On or about, February 18, 2020, the United States Secret Service received the defendant property, approximately \$18,700.04 in United States currency from InComm, via a cashier's check. That \$18,700.04 in currency constitutes all the remaining funds that were loaded onto the 212 prepaid access devices identified in Exhibit A.

**Approximately \$2,776.72 in United States currency**

8. The defendant property, approximately \$2,776.72 in United States currency, was seized as evidence by the Elm Grove, Wisconsin Police Department as follows:

- A. Approximately \$1,946.72 from Gamlet Kazarian on or about November 15, 2019, at or near the Elm Grove Police Department, 13600 Juneau Blvd., Elm Grove, Wisconsin,
- B. Approximately \$130.00 from Gevorg Poghosyan on or about November 15, 2019, at or near the Elm Grove Police Department, 13600 Juneau Blvd., Elm Grove, Wisconsin, and
- C. Approximately \$700.00 from Gevorg Poghosyan on or about November 16, 2019, at the Travelodge Hotel, Room #108, 1716 W. Layton Avenue, Milwaukee, Wisconsin.

9. On or about December 23, 2019, pursuant to seizure warrant #19-989M issued by United States Magistrate Judge Nancy Joseph in the Eastern District of Wisconsin, the United States Secret Service seized the approximately \$2,776.72 in United States currency from the Elm Grove Police Department.

10. The defendant properties, approximately \$18,700.04 in United States currency from InComm and approximately \$2,776.72 in United States currency (collectively the “Defendant Properties”), are presently in the custody of the United States Secret Service in Milwaukee, Wisconsin.

### **Jurisdiction and Venue**

11. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

12. This Court has *in rem* jurisdiction over the Defendant Properties under 28 U.S.C. § 1355(b).

13. Venue is proper in this district under 28 U.S.C. § 1355(b)(1), because acts or omissions giving rise to the forfeiture occurred, in part, in this district.

### **Basis for Forfeiture**

14. The defendant property, approximately \$18,700.04 in United States currency from InComm, is subject to forfeiture to the United States of America under 18 U.S.C. § 981(a)(1)(C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), because: (a) it consists of funds that were stored on the 212 prepaid access devices identified in Exhibit A, and (b) those funds, in turn, constitute proceeds traceable to both wire fraud and access device fraud offenses, committed in violation of 18 U.S.C. §§ 1343 and 1029, respectively.

15. The defendant property, approximately \$18,700.04 in United States currency from InComm, is also subject to forfeiture to the United States of America under 18 U.S.C. § 981(a)(1)(A) because those funds were “involved in” a money laundering conspiracy.

16. The defendant property, approximately \$2,776.72 in United States currency, is subject to forfeiture to the United States of America under 18 U.S.C. § 981(a)(1)(C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), because it constitutes proceeds traceable to both wire fraud and access device fraud offenses, committed in violation of 18 U.S.C. §§ 1343 and 1029, respectively.

### **Facts**

17. Gevorg Poghosyan, Gamlet Kazarian, Ashot Tamamyan, and an individual having the initials N.P. (the “co-conspirators”) engaged in a scheme to defraud through which they essentially stole the value of prepaid access cards.

18. The co-conspirators did so, first, by stealing unloaded, that is, non-activated, prepaid access devices, such as gift cards, from retail locations.

19. The co-conspirators then altered the activation codes on prepaid access devices that they had stolen by:

A. Printing new bar activation codes and bar code numbers on photo paper;

- B. Cutting out strips bearing those bar codes and numbers; and
- C. Carefully inserting those bar-code strips of paper into the cardboard packaging of the stolen prepaid access devices so that the inserted fake bar code numbers obscured the true activation codes of those stolen prepaid access devices.

20. In that way, the co-conspirators made the altered activation bar codes in the packaging of the stolen prepaid access devices look authentic.

21. But, in fact, the altered activation bar codes matched the bar codes of other prepaid access devices that the co-conspirators owned or controlled.

22. In furtherance of their scheme, the co-conspirators went to retail locations and placed access devices bearing altered activation bar codes onto store shelves for unsuspecting customers to purchase.

23. When an access device is scanned at the register, it is automatically activated. Such activation typically involves an interstate wiring. That is so because many prepaid cards and gift cards are funded by accounts held at financial institutions located outside Wisconsin.

24. When unsuspecting purchasers went to the store and bought one of those prepaid access devices bearing an altered bar code, the device was automatically activated upon purchase. But the dollar value associated with that access device was directed not to the purchased access device itself but instead to a different access device, associated with the altered bar code, which the co-conspirators owned or controlled.

25. Thus, through their conspiracy and scheme, the co-conspirators stole the value of the altered access devices upon their very purchase.

26. And, in this way, the co-conspirators fraudulently obtained proceeds through their wire and access-device fraud scheme.

**Victim D.E. – Vanilla Visa gift card ending 1677**

27. On or about October 31, 2019, an individual having the initials D.E. purchased a \$200 Vanilla Visa gift card from Walgreens located at 15350 W. Bluemound Road in Elm Grove, Wisconsin. When D.E. attempted to redeem that gift card, it was not activated. The gift card had a sticker with a barcode on the back of the card that did not match the cardboard sleeve that contained the card. The sticker with the activation code resulted in another card being activated, not the card that D.E. had presented to the cashier.

28. According to Incomm, the service provider for Vanilla gift cards, whose principal place of business is in Atlanta, Georgia, on October 31, 2019, at 4:32 p.m.—the time when D.E. had purchased the above-referenced card and when it should have been automatically activated—a different gift card, ending in digits 1677, was actually activated. The balance on the fraudulent account still had a remaining balance of \$200, so Incomm was able to transfer the funds back to D.E.'s original gift card.

**Suspect Tamarayn Ashot seen on surveillance camera at Walgreens in Elm Grove**

29. On November 5, 2019, Elm Grove Police installed a pinhole camera on the gift card display at the Walgreens in Elm Grove, Wisconsin, to try to obtain video if the suspect returned to hang more tampered gift cards.

30. On November 6, 2019, at about 8:35 p.m., police checked the gift card racks at the Walgreens in Elm Grove, Wisconsin, and discovered that six more gifts cards with fraudulent barcodes had been left at the store.

31. Walgreens video shows that on November 6, 2019, at 6:01 p.m. a subject appeared at the gift card racks, removed approximately 20 gift cards from the rack, and put those gift cards in his right pocket. The suspect then removed six gift cards from his left pocket and temporarily placed them on a rod on the display rack. The subject then placed more gift cards

from the rack in his pocket and appeared to level out different hooks. The subject then took the six gift cards that he had originally removed from his left pocket and placed them on six different display rods so that the tampered gift cards were the front-facing cards and the first to be purchased by an unsuspecting customer. The subject then left the store. The subject was in the store for approximately one minute—and the only place he stopped was at the gift card rack.

32. Police distributed the suspect's photo to area law enforcement and Walgreens Loss Prevention. Walgreens Loss Prevention shared the photographs with stores in southeastern Wisconsin.

33. On November 7, 2019, several stores in southeastern Wisconsin recovered similar altered gift cards.

34. Officers checked three Walgreens stores in Greenfield, Wisconsin, and discovered a total of 16 altered Vanilla gift cards—12 of which were recovered from the Walgreens located at 4296 S. 76<sup>th</sup> Street in Greenfield and 4 of which were recovered from the Walgreens located at 4688 S. 108<sup>th</sup> Street in Greenfield. Officers removed all 16 cards from the store display racks, as evidence.

35. On November 7, 2019, South Milwaukee Police had received a complaint of a suspicious person who had purchased gift cards using other gift cards. The same subject was also seen that same day placing tampered gift cards on the gift card rack in a South Milwaukee Walgreens store. The subject in the South Milwaukee Walgreens was the same male suspect who appeared in the Elm Grove Walgreens surveillance video.

36. On November 15, 2019, officers arrested that suspect, Ashot Tamamyan.

#### **Victim C.B. in Des Plaines, Illinois**

37. On November 6, 2019, an individual having the initials C.B. purchased a \$100 gift card from a Walgreens store located at 21 Rand Road, Des Plaines, Illinois. When C.B.

attempted to use the card, C.B. discovered that the card had never been activated. In fact, the card that had been activated as a result of C.B.'s purchase transaction was a different card ending in 3338.

38. A transaction report showed that the funds on the card ending in 3338 were then used to purchase a \$240 gift card ending in 6143 from Walgreens located at 15650 W. Greenfield Avenue, Brookfield, Wisconsin. Video showed N.P. conducting that transaction. N.P. arrived to, and left from, the Brookfield Walgreens in a silver BMW with a sunroof.

39. On November 10, 2019, video surveillance at Home Depot, located at 6489 S. 27<sup>th</sup> Street, Franklin, Wisconsin, showed N.P. using gift card ending in 6143 to conduct transactions at the Home Depot. Video also showed N.P. had arrived at, and left from, the Franklin Home Depot in the same silver BMW.

40. N.P. conducted two transactions at the Franklin Home Depot, one for \$443.56, which was paid, in part, with the \$240 gift card ending in 6143, while the remaining \$159.58 was paid for with card number ending in 4617. The second transaction was a purchase in the amount of \$269.16, with \$240 being paid with card ending in 3683 and \$29.16 paid with card ending in 8092.

41. Gift card ending in 8092 had been purchased at Walgreens located at 370 E. Capitol Drive, Milwaukee, Wisconsin, on November 7, 2019. The subject in the Milwaukee Walgreens video who made that purchase was the same male seen on the Elm Grove Walgreens surveillance camera, Ashot Tamamyan.

#### **Fraudulently obtained access device from Wisconsin linked to purchases in Indiana**

42. On November 5, 2019, a fraudulent gift card ending in 2366 was activated in the amount of \$499 at the Walgreens located at 221 E. Sunset Drive, Waukesha, Wisconsin.



43. That card ending in 2366 was then used to purchase two other gift cards. Specifically, on November 7, 2019, the card ending in 2366 was used to purchase a \$200 gift card ending in 4846 at Target, and was used to activate a \$250 gift card ending in 7074.

44. Transaction details for the card ending in 7074 show multiple purchases from Nordstrom Rack in Wauwatosa, Wisconsin, as well as several purchases from a Kwik Trip store in Oak Creek, Wisconsin.

45. Transaction details for card ending in 4846 show multiple transactions in Illinois and Indiana, notably a transaction at a Comfort Inn Hotel in Hobart, Indiana, and a purchase at a Target store in nearby Munster, Indiana.

- A. The transaction at the Comfort Inn was for a two-night stay, November 9 and 10, 2019, room #307, for two adults. The individual who checked in at the Comfort Inn used an Armenian Passport bearing the name Gevorg Poghosyan.
- B. The transaction detail at the Target store was in the amount of \$4.33 to purchase coffee. Target's surveillance showed that the male who made the purchase returned to a maroon-colored SUV. That male resembled the person on the Armenian passport that was used for the room rental at the Comfort Inn, Gevorg Poghosyan. Another person then exited the SUV and entered the Target store. The second person was Ashot Tamamyan, who appeared on the Elm Grove Walgreens video walking to the gift card display and hanging several gift cards on the display rack, which gift cards had been recovered and found to have been altered.

46. An ALPR (automated license plate recognition) camera at the exit to the Target parking lot captured the license plate on the suspect SUV. The vehicle was a 2014 Kia Sorento bearing Wisconsin registration plate 818XXX. The plate listed to N.P. at 5XXX S. Greenbrook Terrace, #6XXX, Greenfield, Wisconsin 53220. A Wisconsin Department of Transportation image of N.P. appears to match the female who had conducted the Brookfield Walgreens and Franklin Home Depot transactions on the same day, November 10, 2019.

47. On November 13, 2019, the silver BMW that had been seen on video from the Brookfield Walgreens and Franklin Home Depot transactions was in the parking lot at N.P.'s

residence, 5XXX S. Greenbrook Terrace, #6XXX, Greenfield, Wisconsin. The license plate on that silver BMW was Illinois BM39XXX, which listed to M.P. at 1XXX N. 24th Avenue, Melrose Park, Illinois 60160. M.P.'s previous address was 5XXX S. Greenbrook Terrace, #6XXX, Greenfield, Wisconsin.

**November 15, 2019 placement of GPS tracking devices on co-conspirators' vehicles**

48. On November 14, 2019, officers obtained a search warrant to place GPS (global positioning system) devices on both the Kia Sorrento and the BMW.

49. On the morning of November 15, 2019, officers placed a GPS device on the silver BMW while it was parked at N.P.'s residence, 5XXX S. Greenbrook Terrace, Greenfield, Wisconsin.

50. On November 15, 2019, officers saw the Kia Sorrento parked in the parking lot of the Travelodge hotel located at 1716 W. Layton Avenue, Milwaukee, Wisconsin.

51. Officers conducted surveillance on the Kia Sorrento at the Travelodge hotel. At approximately 9:00 a.m., the Kia Sorrento left the hotel. Officers followed the vehicle to the Greenbrook Terrace apartment complex in Greenfield, Wisconsin.

52. During this surveillance, the Kia Sorrento was parked at the 5XXX S. Greenbrook Terrace address at approximately 9:20 a.m. At that location, three male subjects entered two vehicles in the parking lot—one being the Kia Sorrento and the other being an unknown black BMW SUV.

53. Officers continued surveillance on both vehicles as they exited the Greenbrook Terrace apartments and entered the parking lot of the Mobil gas station located at 5030 W. Loomis Road, Greenfield, Wisconsin. Three individuals exited the vehicles. One individual was Ashot Tamamyan, shown in the Elm Grove surveillance camera video manipulating the gift

cards. A second individual was Gevorg Poghosyan, who used an Armenian Passport at the Hobart, Indiana, hotel.

54. Officers continued surveillance on both vehicles, but lost sight of the black BMW SUV.

55. At approximately 11:30 a.m., officers placed a GPS device on the Kia Sorrento while it was parked in a public parking lot at the Southridge Mall in Greendale, Wisconsin. GPS data showed the Kia Sorrento had returned minutes later to N.P.'s address at 5XXX S. Greenbrook Terrace, Greenfield, Wisconsin.

56. The Kia Sorrento then departed from the Greenbrook address approximately one hour later, and investigators followed the Kia Sorrento. The vehicle was driven to several Walgreens and CVS stores in the City of Waukesha. After the occupants of the Kia Sorrento left those locations, police recovered altered access device cards from the display racks at three Walgreens stores and one CVS store.

57. Police conducted surveillance inside and outside the Walgreens located at 230 Madison Street, Waukesha, Wisconsin. After the Kia Sorrento arrived at that location, the front seat passenger, Gamlet Kazarian, exited the vehicle, entered the store, and proceeded directly to the gift card rack. Gamlet Kazarian took several altered prepaid gift cards from his pocket and placed those gift cards onto the gift card rack. Kazarian then exited the store, returned to the Kia Sorrento, and the vehicle drove away. After Kazarian left the store, officers recovered nine altered gift cards from the display rack where Kazarian had placed the gift cards from his pocket.

58. Officers followed the Kia Sorrento and conducted a traffic stop on the Kia Sorrento in the 200 block of Sunset Drive in Waukesha. Three persons were inside the vehicle and were taken into custody – Gevorg Poghosyan, Gamlet Kazarian, and Ashot Tamamyan.

Police found inside the Kia Sorrento two bags containing approximately 200 to 300 gift cards that had been tampered and prepared to be hung onto gift card racks in stores.

**November 15, 2019 execution of search warrant at N.P.'s residence, 5XXX S. Greenbrook Terrace, #6XXX, Greenfield, Wisconsin**

59. On November 15, 2019, officers conducted surveillance at N.P.'s residence, 5XXX S. Greenbrook Terrace #6XXX, Greenfield, Wisconsin, in anticipation of executing a search warrant.

60. Officers saw N.P. exit her apartment with several large pieces of luggage and other items, which she placed into the passenger compartment and trunk of the silver BMW.

61. After N.P. drove away in the BMW, officers conducted a traffic stop on the vehicle in a parking lot several buildings to the south of N.P.'s apartment. During the traffic stop, N.P. admitted that she was acquaintances with Gevorg Poghosyan, Gamlet Kazarian, and Ashot Tamamyan. N.P. told officers that she allowed those individuals to use her Kia Sorrento.

62. N.P. gave officers consent to search the BMW and the luggage inside the BMW. Officers found in the vehicle two bar code readers, garbage bags containing a very large number of torn up cardboard Vanilla Visa gift card display packaging materials with cards removed, and a shoebox containing glue sticks, rubber bands, post-it notes, and a package of photo paper. Officers also located thousands of prepaid access device cards in various locations, including the following:

- A. In a large black suitcase found on the back seat:
  - i. 928 packaged Vanilla Visa gift cards in various denominations. All of the gift cards were altered in that they had a different bar code applied over the true activation bar code.
  - ii. A plastic bag containing 159 gift cards that were not in the manufacturer's original packaging. Those gift cards were neatly rubber banded together, mostly in stacks of 28 cards each. The stacks were also labeled with small post-it notes with the letters "WT" and a unique number.

- B. In a medium-sized silver suitcase found in the front seat: 397 packaged Vanilla Visa gift cards in various denominations. All of the gift cards were altered in that they had a different bar code applied over the true activation bar code.
- C. In a red shoe box found in the trunk: 1,007 gift cards that were not in the manufacturer's original packaging. They were neatly rubber banded together, mostly in stacks of 28 cards each. The stacks were also labeled with small post-it notes with the letters "WT" and a unique number.
- D. In a white shoebox found in the trunk: 1,045 gift cards that were not in the manufacturer's original packaging. They were neatly rubber banded together, mostly in stacks of 28 cards each. The stacks were also labeled with small post-it notes with the letters "WT" and a unique number.
- E. In a black purse found in the trunk: 441 prepaid gift cards that were not in the manufacturer's original packaging. They were neatly rubber banded together, mostly in stacks of 28 cards each. The stacks were also labeled with small post-it notes with the letters "WT" and a unique number.
- F. In a plastic Cermak bag found in the trunk: 233 packaged Vanilla Visa gift cards in various denominations. All of the gift cards were altered with a different bar code applied over the true activation bar code.

63. Officers escorted N.P. back to her residence and executed the search warrant there. Police found and seized property that N.P. had been shown on video purchasing at the Franklin Home Depot using fraud proceeds. These items, located in her bedroom, included: an HDX cord storage reel, one six-foot braided cord surge protector, one Rigged six-outlet surge protector, one Echo 20" chainsaw guide bar, one multi-use torch kit, one Lincoln electric welding helmet, one Rigged 10-gallon stainless steel wet/dry vacuum, three Rigged high quality dry pick up dust bags, one Rigged standard wet/dry filter, two Ryobi chainsaw tune-up kits, four Echo 20" chainsaw blades, and one Décor 10-foot USB extension cord charger.

64. Officers also seized from the residence one HP laptop computer, one Brother printer model HL-L2395DW, one Acer computer, and one bar code scanner quick set-up instruction guide.

**November 16, 2019 execution of search warrant at Room #108 of the Travelodge Hotel, 1716 W. Layton Avenue, Milwaukee, Wisconsin**

65. On November 16, 2019, officers executed a search warrant at Room #108 of the Travelodge Hotel, 1716 W. Layton Avenue, Milwaukee, Wisconsin. Hotel room #108 had been rented by Gevorg Poghosyan. No persons were in the room at the time of the search.

66. Inside room #108, officers found several pieces of evidence related to the access device fraud scheme, including the following items seized as evidence:

- A. A silver and black medium-size suitcase containing miscellaneous items,
- B. Gevorg Poghosyan's wallet and identification,
- C. \$700 in United States currency,
- D. A flight itinerary for a flight from Chicago O'Hare to Stockholm on November 19, 2019,
- E. Two Target MasterCard gift cards,
- F. A blue HP Stream laptop (model #14-DS0003DX, serial #5CD9320S) located on the bed side table,
- G. A laptop charger and cord that was connected to the HP Stream laptop and plugged into a wall outlet, and
- H. A notebook that appeared to be a ledger for distribution of fraud proceeds.

**Prepaid access device cards seized as evidence**

67. As described above, officers seized a total of approximately 4,310 prepaid access devices, or gift cards, during the search of N.P.'s BMW on November 15, 2019. Of those recovered access device cards, a total of approximately 2,752 were not in the manufacturer's retail packaging, a fact indicating that the cards had the potential to be, or to have been, activated and loaded with funds. The remaining approximately 1,558 packaged cards had tampered/altered barcodes, which indicated that the cards were going to be placed back on the retailer's shelves and had not yet been activated.

68. Investigators used an Electronic Recovery and Access to Data device (ERAD) to scan the magnetic strips of all of the loose 2,752 cards and found 208 of the cards had balances with available funds that constituted criminal proceeds. The 208 cards were placed into evidence at the Greenfield Police Department.

69. Elm Grove Police Officers seized four prepaid gift cards from Gevorg Poghosyan upon his arrest. Investigators checked those four cards using ERAD, and the cards had balances with available funds that constituted criminal proceeds. Those four cards were placed into evidence at the Elm Grove Police Department.

**A total of approximately \$2,776.72 in United States currency seized as evidence**

70. On November 15, 2019, officers seized a total of \$2,076.72 in United States currency during the arrest of Gamlet Kazarian and Gevorg Poghosyan as follows:

- A. A total of \$1,946.72 from Gamlet Kazarian.
- B. A total of \$130 from Gevorg Poghosyan.

71. On November 16, 2019, as noted above, officers seized a total of \$700 in United States currency during execution of the search warrant at the Travelodge Hotel, Room #108, 1716 W. Layton Avenue, Milwaukee, Wisconsin, which room had been rented by Gevorg Poghosyan.

**State Charges**

**Gevorg Poghosyan**

72. On November 19, 2019, Gevorg Poghosyan, was charged in Waukesha County Circuit Court, Case No. 19CF1636, with nine counts of forgery, as a party to a crime.

73. On February 14, 2020, in Case No. 19CF1636, Gevorg Poghosyan pleaded guilty to one count of forgery, as a party to a crime. Poghosyan was sentenced to 208 days in jail.

### **Gamlet Kazarian**

74. On November 19, 2019, Gamlet Kazarian, was charged in Waukesha County Circuit Court, Case No. 19CF1635, with nine counts of forgery, as a party to a crime.

75. On February 14, 2020, in Case No. 19CF1635, Gamlet Kazarian pleaded guilty to one count of forgery, as a party to a crime. Kazarian was sentenced to seven months in jail.

### **Ashot Tamamyan**

76. On November 19, 2019, Ashot Tamamyan, was charged in Waukesha County Circuit Court, Case No. 19CF1633, with six counts of forgery. The case is still open.

### **Warrant for Arrest In Rem**

77. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the Defendant Properties pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

### **Claims for Relief**

78. The plaintiff alleges and incorporates by reference the paragraphs above.

79. By the foregoing and other acts, the defendant property, approximately \$18,700.04 in United States currency from InComm, consists of funds that were stored on the 212 prepaid access devices, and those funds, in turn, constitute proceeds traceable to both wire fraud and access device fraud offenses, committed in violation of 18 U.S.C. §§ 1343 and 1029, respectively, and were also “involved in” a money laundering conspiracy, committed in violation of 18 U.S.C. § 1956(h).

80. The defendant property, approximately \$18,700.04 in United States currency from InComm, is therefore subject to forfeiture to the United States of America under 18 U.S.C. §§ 981(a)(1)(A) and (C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1).



81. The defendant property, approximately \$2,776.72 in United States currency, constitutes proceeds traceable to both wire fraud and access device fraud offenses, committed in violation of 18 U.S.C. §§ 1343 and 1029.

82. The defendant property, approximately \$2,776.72 in United States currency, is therefore subject to forfeiture to the United States of America under 18 U.S.C. § 981(a)(1)(C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1).

WHEREFORE, the United States of America prays that a warrant of arrest for the Defendant Properties be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the Defendant Properties to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 13<sup>th</sup> day of April, 2020.

Respectfully submitted,

MATTHEW D. KRUEGER  
United States Attorney

By:

s/SCOTT J. CAMPBELL  
SCOTT J. CAMPBELL  
Assistant United States Attorney  
Scott J. Campbell Bar Number: 1017721  
Attorney for Plaintiff  
Office of the United States Attorney  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 530  
Milwaukee, Wisconsin 53202  
Telephone: (414) 297-1700  
Fax: (414) 297-1738  
E-Mail: [scott.campbell@usdoj.gov](mailto:scott.campbell@usdoj.gov)

### **Verification**

I, Brian Wallander, hereby verify and declare under penalty of perjury that I am a Detective with the City of Greenfield Police Department and a Task Force Agent assigned to the United States Secret Service Milwaukee Resident Office Financial Crimes Task Force (“MFCTF”), that I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents thereof, and that the factual matters contained in paragraphs 17 through 76 of the Verified Complaint are true to my own knowledge.

The sources of my knowledge and information are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Detective with the City of Greenfield Police Department and a Task Force Agent with the MFCTF.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: 4-13-2020

s/BRIAN WALLANDER  
Brian Wallander

**Exhibit A**

<b>No.</b>	<b>Bank</b>	<b>Account Number</b>	<b>Brand</b>
1	Metabank	425097XXXXXX3999	VISA
2	Metabank	425097XXXXXX1284	VISA
3	Metabank	425097XXXXXX4400	VISA
4	Metabank	425097XXXXXX0203	VISA
5	Metabank	425097XXXXXX0345	VISA
6	Metabank	425097XXXXXX4164	VISA
7	The Bancorp Bank	484718XXXXXX3441	VISA
8	The Bancorp Bank	484718XXXXXX8308	VISA
9	The Bancorp Bank	484718XXXXXX1175	VISA
10	The Bancorp Bank	484718XXXXXX3112	VISA
11	The Bancorp Bank	484718XXXXXX9260	VISA
12	The Bancorp Bank	484718XXXXXX2740	VISA
13	The Bancorp Bank	484718XXXXXX4648	VISA
14	The Bancorp Bank	484718XXXXXX8415	VISA
15	The Bancorp Bank	484718XXXXXX9931	VISA
16	The Bancorp Bank	484718XXXXXX9576	VISA
17	The Bancorp Bank	484718XXXXXX9674	VISA
18	The Bancorp Bank	484718XXXXXX5597	VISA
19	The Bancorp Bank	484718XXXXXX4123	VISA
20	The Bancorp Bank	484718XXXXXX8013	VISA
21	The Bancorp Bank	484718XXXXXX0801	VISA
22	The Bancorp Bank	484718XXXXXX2923	VISA
23	The Bancorp Bank	484718XXXXXX3810	VISA
24	The Bancorp Bank	484718XXXXXX3028	VISA
25	The Bancorp Bank	484718XXXXXX9512	VISA
26	The Bancorp Bank	484718XXXXXX8546	VISA
27	The Bancorp Bank	484718XXXXXX4649	VISA
28	The Bancorp Bank	484718XXXXXX1038	VISA
29	The Bancorp Bank	484718XXXXXX1518	VISA
30	The Bancorp Bank	484718XXXXXX4894	VISA
31	The Bancorp Bank	484718XXXXXX1683	VISA
32	The Bancorp Bank	484718XXXXXX5993	VISA
33	The Bancorp Bank	484718XXXXXX9748	VISA
34	The Bancorp Bank	484718XXXXXX5992	VISA
35	The Bancorp Bank	484718XXXXXX6041	VISA
36	The Bancorp Bank	484718XXXXXX4534	VISA
37	The Bancorp Bank	484718XXXXXX2277	VISA
38	The Bancorp Bank	484718XXXXXX7798	VISA
39	The Bancorp Bank	484718XXXXXX4579	VISA
40	The Bancorp Bank	484718XXXXXX3596	VISA
41	The Bancorp Bank	484718XXXXXX1839	VISA
42	The Bancorp Bank	484718XXXXXX3807	VISA
43	The Bancorp Bank	484718XXXXXX0817	VISA

<b>No.</b>	<b>Bank</b>	<b>Account Number</b>	<b>Brand</b>
44	The Bancorp Bank	484718XXXXXX1571	VISA
45	The Bancorp Bank	484718XXXXXX9077	VISA
46	The Bancorp Bank	484718XXXXXX6355	VISA
47	The Bancorp Bank	484718XXXXXX1332	VISA
48	The Bancorp Bank	484718XXXXXX3685	VISA
49	The Bancorp Bank	484718XXXXXX9062	VISA
50	The Bancorp Bank	484718XXXXXX4659	VISA
51	The Bancorp Bank	484718XXXXXX3367	VISA
52	The Bancorp Bank	484718XXXXXX2047	VISA
53	The Bancorp Bank	484718XXXXXX7987	VISA
54	The Bancorp Bank	484718XXXXXX1315	VISA
55	The Bancorp Bank	484718XXXXXX1375	VISA
56	The Bancorp Bank	484718XXXXXX3301	VISA
57	The Bancorp Bank	484718XXXXXX9414	VISA
58	The Bancorp Bank	484718XXXXXX6206	VISA
59	The Bancorp Bank	484718XXXXXX2184	VISA
60	The Bancorp Bank	484718XXXXXX9367	VISA
61	The Bancorp Bank	484718XXXXXX3565	VISA
62	The Bancorp Bank	484718XXXXXX9033	VISA
63	The Bancorp Bank	484718XXXXXX2985	VISA
64	The Bancorp Bank	484718XXXXXX9782	VISA
65	The Bancorp Bank	484718XXXXXX3112	VISA
66	The Bancorp Bank	484718XXXXXX2832	VISA
67	The Bancorp Bank	484718XXXXXX9845	VISA
68	The Bancorp Bank	484718XXXXXX9544	VISA
69	The Bancorp Bank	48471XXXXXX78329	VISA
70	The Bancorp Bank	484718XXXXXX6794	VISA
71	The Bancorp Bank	484718XXXXXX6829	VISA
72	The Bancorp Bank	484718XXXXXX3913	VISA
73	The Bancorp Bank	484718XXXXXX5464	VISA
74	The Bancorp Bank	484718XXXXXX2941	VISA
75	The Bancorp Bank	484718XXXXXX2436	VISA
76	The Bancorp Bank	484718XXXXXX3358	VISA
77	The Bancorp Bank	484718XXXXXX2561	VISA
78	The Bancorp Bank	484718XXXXXX1727	VISA
79	The Bancorp Bank	484718XXXXXX3223	VISA
80	The Bancorp Bank	484718XXXXXX5232	VISA
81	The Bancorp Bank	484718XXXXXX9787	VISA
82	The Bancorp Bank	484718XXXXXX0894	VISA
83	The Bancorp Bank	484718XXXXXX7947	VISA
84	The Bancorp Bank	484718XXXXXX7913	VISA
85	The Bancorp Bank	484718XXXXXX6284	VISA
86	The Bancorp Bank	484718XXXXXX3808	VISA
87	The Bancorp Bank	484718XXXXXX9097	VISA
88	The Bancorp Bank	484718XXXXXX6031	VISA

<b>No.</b>	<b>Bank</b>	<b>Account Number</b>	<b>Brand</b>
89	The Bancorp Bank	484718XXXXXX7261	VISA
90	The Bancorp Bank	484718XXXXXX6586	VISA
91	The Bancorp Bank	484718XXXXXX5546	VISA
92	The Bancorp Bank	484718XXXXXX0488	VISA
93	The Bancorp Bank	484718XXXXXX5133	VISA
94	The Bancorp Bank	484718XXXXXX8837	VISA
95	The Bancorp Bank	484718XXXXXX3187	VISA
96	The Bancorp Bank	484718XXXXXX6259	VISA
97	The Bancorp Bank	484718XXXXXX0181	VISA
98	The Bancorp Bank	484718XXXXXX8686	VISA
99	The Bancorp Bank	484718XXXXXX6008	VISA
100	The Bancorp Bank	484718XXXXXX6174	VISA
101	The Bancorp Bank	484718XXXXXX8978	VISA
102	The Bancorp Bank	484718XXXXXX4074	VISA
103	The Bancorp Bank	484718XXXXXX3222	VISA
104	The Bancorp Bank	484718XXXXXX1627	VISA
105	The Bancorp Bank	484718XXXXXX4095	VISA
106	The Bancorp Bank	484718XXXXXX4590	VISA
107	The Bancorp Bank	484718XXXXXX6625	VISA
108	The Bancorp Bank	484718XXXXXX4001	VISA
109	The Bancorp Bank	484718XXXXXX2628	VISA
110	The Bancorp Bank	484718XXXXXX9679	VISA
111	The Bancorp Bank	484718XXXXXX0306	VISA
112	The Bancorp Bank	484718XXXXXX8738	VISA
113	The Bancorp Bank	484718XXXXXX3212	VISA
114	The Bancorp Bank	484718XXXXXX2359	VISA
115	The Bancorp Bank	484718XXXXXX2955	VISA
116	The Bancorp Bank	484718XXXXXX6610	VISA
117	The Bancorp Bank	484718XXXXXX3287	VISA
118	The Bancorp Bank	484718XXXXXX9567	VISA
119	The Bancorp Bank	484718XXXXXX1578	VISA
120	The Bancorp Bank	484718XXXXXX0589	VISA
121	The Bancorp Bank	484718XXXXXX8519	VISA
122	The Bancorp Bank	484718XXXXXX8380	VISA
123	The Bancorp Bank	484718XXXXXX6344	VISA
124	The Bancorp Bank	484718XXXXXX7385	VISA
125	The Bancorp Bank	484718XXXXXX6095	VISA
126	The Bancorp Bank	484718XXXXXX2723	VISA
127	The Bancorp Bank	484718XXXXXX7617	VISA
128	The Bancorp Bank	484718XXXXXX9485	VISA
129	The Bancorp Bank	484718XXXXXX2370	VISA
130	The Bancorp Bank	484718XXXXXX6169	VISA
131	The Bancorp Bank	484718XXXXXX7233	VISA
132	The Bancorp Bank	484718XXXXXX0617	VISA
133	The Bancorp Bank	484718XXXXXX2476	VISA

<b>No.</b>	<b>Bank</b>	<b>Account Number</b>	<b>Brand</b>
134	The Bancorp Bank	484718XXXXXX3861	VISA
135	The Bancorp Bank	484718XXXXXX1291	VISA
136	The Bancorp Bank	484718XXXXXX0511	VISA
137	The Bancorp Bank	484718XXXXXX3187	VISA
138	The Bancorp Bank	484718XXXXXX4477	VISA
139	The Bancorp Bank	484718XXXXXX0237	VISA
140	The Bancorp Bank	484718XXXXXX1128	VISA
141	The Bancorp Bank	484718XXXXXX3283	VISA
142	The Bancorp Bank	484718XXXXXX9467	VISA
143	The Bancorp Bank	484718XXXXXX4282	VISA
144	The Bancorp Bank	484718XXXXXX3640	VISA
145	The Bancorp Bank	484718XXXXXX7874	VISA
146	The Bancorp Bank	484718XXXXXX0151	VISA
147	The Bancorp Bank	484718XXXXXX9235	VISA
148	The Bancorp Bank	484718XXXXXX0012	VISA
149	The Bancorp Bank	484718XXXXXX4655	VISA
150	The Bancorp Bank	484718XXXXXX6358	VISA
151	The Bancorp Bank	484718XXXXXX4986	VISA
152	The Bancorp Bank	484718XXXXXX1019	VISA
153	The Bancorp Bank	484718XXXXXX4232	VISA
154	The Bancorp Bank	484718XXXXXX8732	VISA
155	The Bancorp Bank	484718XXXXXX6276	VISA
156	The Bancorp Bank	484718XXXXXX2644	VISA
157	The Bancorp Bank	484718XXXXXX7338	VISA
158	The Bancorp Bank	484718XXXXXX5533	VISA
159	The Bancorp Bank	484718XXXXXX8486	VISA
160	The Bancorp Bank	484718XXXXXX9761	VISA
161	The Bancorp Bank	484718XXXXXX2827	VISA
162	The Bancorp Bank	484718XXXXXX9227	VISA
163	The Bancorp Bank	484718XXXXXX3266	VISA
164	The Bancorp Bank	484718XXXXXX1205	VISA
165	The Bancorp Bank	484718XXXXXX0420	VISA
166	The Bancorp Bank	484718XXXXXX6328	VISA
167	The Bancorp Bank	484718XXXXXX5031	VISA
168	The Bancorp Bank	484718XXXXXX1310	VISA
169	The Bancorp Bank	484718XXXXXX1636	VISA
170	The Bancorp Bank	484718XXXXXX9921	VISA
171	The Bancorp Bank	484718XXXXXX5419	VISA
172	The Bancorp Bank	484718XXXXXX6103	VISA
173	The Bancorp Bank	484718XXXXXX0917	VISA
174	The Bancorp Bank	484718XXXXXX7762	VISA
175	The Bancorp Bank	484718XXXXXX3215	VISA
176	The Bancorp Bank	484718XXXXXX2050	VISA
177	The Bancorp Bank	484718XXXXXX5096	VISA
178	The Bancorp Bank	484718XXXXXX2905	VISA

<b>No.</b>	<b>Bank</b>	<b>Account Number</b>	<b>Brand</b>
179	The Bancorp Bank	484718XXXXXX2797	VISA
180	The Bancorp Bank	484718XXXXXX9459	VISA
181	The Bancorp Bank	484718XXXXXX6982	VISA
182	The Bancorp Bank	484718XXXXXX8151	VISA
183	The Bancorp Bank	484718XXXXXX8960	VISA
184	The Bancorp Bank	484718XXXXXX1558	VISA
185	The Bancorp Bank	484718XXXXXX9245	VISA
186	The Bancorp Bank	484718XXXXXX0593	VISA
187	The Bancorp Bank	484718XXXXXX7963	VISA
188	The Bancorp Bank	484718XXXXXX5292	VISA
189	The Bancorp Bank	484718XXXXXX6888	VISA
190	The Bancorp Bank	484718XXXXXX9865	VISA
191	The Bancorp Bank	484718XXXXXX2221	VISA
192	The Bancorp Bank	484718XXXXXX2389	VISA
193	The Bancorp Bank	484718XXXXXX7717	VISA
194	The Bancorp Bank	484718XXXXXX7134	VISA
195	The Bancorp Bank	484718XXXXXX3628	VISA
196	The Bancorp Bank	484718XXXXXX6816	VISA
197	The Bancorp Bank	484718XXXXXX3052	VISA
198	The Bancorp Bank	484718XXXXXX3840	VISA
199	The Bancorp Bank	484718XXXXXX2783	VISA
200	The Bancorp Bank	484718XXXXXX4179	VISA
201	The Bancorp Bank	484718XXXXXX4230	VISA
202	The Bancorp Bank	484718XXXXXX7575	VISA
203	The Bancorp Bank	484718XXXXXX3172	VISA
204	The Bancorp Bank	484718XXXXXX9922	VISA
205	The Bancorp Bank	484718XXXXXX6075	VISA
206	The Bancorp Bank	484718XXXXXX5713	VISA
207	The Bancorp Bank	484718XXXXXX8460	VISA
208	The Bancorp Bank	484718XXXXXX7961	VISA
209	The Bancorp Bank	484718XXXXXX9442	VISA
210	The Bancorp Bank	484718XXXXXX6526	VISA
211	The Bancorp Bank	484718XXXXXX0075	VISA
212	The Bancorp Bank	484718XXXXXX2037	VISA



# CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

Place an "X" in the appropriate box: ☐ Green Bay Division ☒ Milwaukee Division

## I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Scott J. Campbell, AUSA

US Attorney's Office, #530 Federal Building

517 E. Wisconsin Avenue, Milwaukee, WI 53202 (414-297-1700)

## DEFENDANTS

APPROXIMATELY \$18,700.04 IN UNITED STATES CURRENCY  
FROM INCOMM, ET AL.

County of Residence of First Listed Defendant Milwaukee

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input checked="" type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	SOCIAL SECURITY
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIW W (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
			IMMIGRATION	FEDERAL TAX SUITS
			<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

## V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
18 USC §§ 981(a)(1)(A) and (C)

Brief description of cause:

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$**

CHECK YES only if demanded in complaint:

**JURY DEMAND:** ☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE

SIGNATURE OF ATTORNEY OF RECORD

04/13/2020

s/SCOTT J. CAMPBELL

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_

AMOUNT \_\_\_\_\_

Case 2:20-cv-00594 Filed 04/13/20 Page 1 of 1 Document 1-2

APPLYING \_\_\_\_\_

JUDGE \_\_\_\_\_

MAJ. JUDGE \_\_\_\_\_



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
AT LAW AND IN ADMIRALTY

---

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$18,700.04 IN UNITED  
STATES CURRENCY FROM INCOMM, and

APPROXIMATELY \$2,776.72 IN UNITED  
STATES CURRENCY,

Defendants.

---

**WARRANT FOR ARREST IN REM**

---

To: THE UNITED STATES SECRET SERVICE  
Eastern District of Wisconsin

WHEREAS, a Verified Complaint for Civil Forfeiture *in rem* was filed on the 13<sup>th</sup> day of April, 2020, by the United States Attorney for the Eastern District of Wisconsin, which seeks the forfeiture of the above-named defendant properties pursuant to Title 18, United States Code, Sections 981(a)(1)(A) and (C), including cross-references to Title 18, United States Code, Sections 1956(c)(7) and 1961(1), and which prays that process issue to enforce the forfeiture and to give notice to all interested parties to appear before the court and show cause why the forfeiture should not be decreed; and due proceedings being had, that the defendant properties be condemned and forfeited to the use of the United States of America.

YOU ARE THEREFORE HEREBY COMMANDED to attach and arrest the following defendant properties, which are presently in the custody of the United States Secret Service in

Milwaukee, Wisconsin, in the Eastern District of Wisconsin, and to detain the same until further order of this Court:

- A. Approximately \$18,700.04 in United States currency from InComm, which constitutes all the remaining funds that were loaded onto the 212 prepaid access devices identified in Exhibit A attached to the Verified Complaint for Civil Forfeiture *in rem*, and which funds were seized on or about February 18, 2020, and
- B. Approximately \$2,776.72 in United States currency, which was seized as evidence by the Elm Grove, Wisconsin Police Department as follows:
  - i. Approximately \$1,946.72 from Gamlet Kazarian on or about November 15, 2019, at or near the Elm Grove Police Department, 13600 Juneau Blvd., Elm Grove, Wisconsin,
  - ii. Approximately \$130.00 from Gevorg Poghosyan on or about November 15, 2019, at or near the Elm Grove Police Department, 13600 Juneau Blvd., Elm Grove, Wisconsin, and
  - iii. Approximately \$700.00 from Gevorg Poghosyan on or about November 16, 2019, at the Travelodge Hotel, Room #108, 1716 W. Layton Avenue, Milwaukee, Wisconsin.

Dated this \_\_\_\_ day of \_\_\_\_\_, 2020, at Milwaukee, Wisconsin.

STEPHEN C. DRIES  
Clerk of Court

By:

\_\_\_\_\_  
Deputy Clerk

**Return**

This warrant was received and executed with the arrest of the above-named defendants.

Date warrant received: \_\_\_\_\_

Date warrant executed: \_\_\_\_\_

Name and title of arresting officer: \_\_\_\_\_

Signature of arresting officer: \_\_\_\_\_

Date: \_\_\_\_\_